

**REMARKS**

Claims 1-23 are pending in the application. Claims 1, 8, 15, 22 and 23 are the independent claims. Claims 5, 12 and 19 have been objected to as being dependent on a rejected base claim but would be allowable if rewritten in independent form.

Claim 1 as now amended includes the subject matter of Claim 5. Claim 5 is now cancelled in favor of Claim 1. The foregoing amendments to Claim 1 effectively rewrite Claim 5 in independent form.

Claim 8 as now amended includes the subject matter of Claim 12 and Claim 12 is now cancelled in favor of Claim 8. Claim 8 as now amended thus effectively rewrites Claim 12 in independent form.

Claim 15 is now amended to include the subject matter of Claim 19, and Claim 19 is now cancelled in favor of Claim 15. The foregoing amendments to Claim 15 effectively rewrite Claim 19 in independent form.

Acceptance of the foregoing claim amendments is respectfully requested.

Claims 1, 7, 8, 14, 15 and 21-23 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Van Tichelen et al. (U.S. Patent No. 6,311,159). Claims 4, 11 and 18 have been rejected under U.S.C. § 103 as being unpatentable over Van Tichelen et al. Claims 6, 13 and 20 have been rejected under 35 U.S.C. § 103 as being unpatentable over Van Tichelen et al. in view of Carbonell et al. (U.S. Patent No. 5,677,835).

Base Claims 1, 8, 15, 22 and 23 have now been amended to recite the step of (or the language generator) "...generating a goal based on the response representation and determining the selected syntax template based on the goal-directed rule selected from a goal oriented rules data base based on the goal, the goal-directed rule identifying the selected syntax template." As indicated on page 6, paragraph 6 of the Office Action at hand, allowable subject matter is found because "Van Tichelen et al. do not disclose that the language generator (message generator 36) provides any of the generation of goals (intentions)." Thus, base Claims 1, 8, 15, 22 and 23 as now amended are not anticipated by Van Tichelen et al. Claim 7 is dependent on Claim 1 and Claim 14 is dependent on Claim 8. Similarly, Claim 21 is dependent on Claim 15. Thus, each of these dependent claims inherit the claim limitations of the respective base claim, namely "generating a goal based on the response representation" which is not disclosed or otherwise

suggested by the cited art. As such, the § 102(e) rejection of Claims 1, 7, 8, 14, 15 and 21-23 is believed to be overcome. Acceptance is respectfully requested.

Claim 4 is dependent from Claim 1, Claim 11 is dependent from Claim 8, and Claim 18 is dependent from Claim 15. Thus the foregoing arguments with regard to base Claims 1, 8 and 15 over Van Tichelen et al. apply to dependent Claims 4, 11 and 18. Where Van Tichelen et al. does not imply or suggest the "generating a goal" by the language generator or by the step of selecting a syntax template as now claimed in Claims 4, 11 and 18, Van Tichelen et al. does not make obvious the invention of these claims. Accordingly, the § 103 rejection of Claims 4, 11 and 18 is believed to be overcome and withdrawal of this rejection is respectfully requested.

Claim 6 is dependent from Claim 1, Claim 13 is dependent from Claim 8 and Claim 20 is dependent from Claim 15. Each of these dependent claims inherit the claim limitations of the respective base claim. As argued above, Van Tichelen et al. does not imply or suggest the language generator or step of selecting a syntax template generating a goal based on the response representation as now claimed in the base claims. Carbonell et al. does not add to Van Tichelen et al. this goal generation. As such, no combination of Van Tichelen and Carbonell et al. implies or suggests the present invention as now claimed. Thus, the § 103 rejection of Claims 6, 13 and 20 is believed to be overcome and withdrawal of the rejection is respectfully requested.

### **CONCLUSION**

In view of the above amendments and remarks, it is believed that all now pending claims (Claims 1-4, 6-11, 13-18 and 20-23) are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone

-10-

conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

HAMILTON, BROOK, SMITH & REYNOLDS, P.C.

By   
Mary Lou Wakimura  
Registration No. 31,804  
Telephone: (978) 341-0036  
Facsimile: (978) 341-0136

Concord, MA 01742-9133

Dated: 2/8/05